LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, 8TH FLOOR NEW YORK, NY 10011 TEL: 212-465-1188 FAX: 212-465-1181 INFO@LEELITIGATION.COM

WRITER'S DIRECT: (212) 465-1188

cklee@leelitigation.com

May 17, 2024

Via ECF

The Honorable James L. Cott, U.S.M.J. United States District Court Southern District of New York 500 Pearl Street, Room 1360 New York, New York 10007

Re: Shaun Thompson et al., v. Elev8 Foundation Inc., et al.

Case No.: 1:20-cv-09581 (MMG) (JLC)

Dear Judge Cott:

We are counsel to Plaintiff in the above referenced matter. We write jointly with Defendants to respectfully request that the Court stay all discovery and interim deadlines while the parties pursue a second day of class-wide mediation.

The mediators we are speaking to have earliest availability in late August and September, and therefore we are requesting until the end of September to complete mediation and report back to the Court.

This is the parties' second request to stay deadlines in order to pursue private mediation and is requested by all parties. The prior request was granted.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee C.K. Lee, Esq.

cc: all parties via ECF